

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIANLIN ZHANG,

Plaintiff,

v.

PAMELA BONDI, in her official capacity as Attorney General of the United States, KRISTI NOEM, in her official capacity as Secretary of the Department of Homeland Security, JOSEPH B. EDLOW, in his official capacity as Acting Director of U.S. Citizenship and Immigration,¹ U.S. CITIZENSHIP AND IMMIGRATION SERVICES, and ZORAIDA GOMEZ, in her official capacity as Field Office Director of the USCIS (New York Field Office),

Defendants.

No. 25 Civ. 4838 (AT) (HJR)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Complaint, Defendants Attorney General Pamela Bondi, Secretary of Homeland Security Kristi Noem, Director of U.S. Citizenship and Immigration Services ("USCIS") Joseph B. Edlow, USCIS, and USCIS New York City Field Office Director Zoraida Gomez, by their attorney, Jay Clayton, United States Attorney for the Southern District of New York, hereby move this Court for an order dismissing the Complaint in the above-captioned matter pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule IV(A) of the Court's

¹ Pursuant to Federal Rule of Civil Procedure 25(d), the above-referenced individuals are automatically substituted for Merick B. Garland, Alejandro Mayorkas, and Kika Scott as defendants in this matter.

Individual Practices in *Pro Se* Cases, any opposition to this motion must be filed in Court and served on the U.S. Attorney's Office for the Southern District of New York by September 9, 2025.

Dated: New York, New York
August 12, 2025

Respectfully submitted,

JAY CLAYTON
United States Attorney for the
Southern District of New York

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